

CIVIL COVER SHEET

15-cv-3165

The JS 44 civil cover sheet and information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

LIVE FACE ON WEB, LLC

(b) County of Residence of First Listed Plaintiff BUCKS COUNTY, PA
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
LAW OFFICES OF JASON RABINOVICH, PLLC
1700 MARKET STREET, SUITE 1005
PHILADELPHIA, PA 19103

DEFENDANTS

EXPRESS SIGN OUTLET, INC., and
LINDA DEPAOLO

County of Residence of First Listed Defendant LEHIGH COUNTY, PA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
17 U.S.C. 501, et. seq.

Brief description of cause:
COPYRIGHT INFRINGEMENT

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE See attached list

DOCKET NUMBER See attached list

DATE
07/07/2015SIGNATURE OF ATTORNEY OF RECORD
/s/ Jason Rabinovich, Esq.

FOR OFFICE USE ONLY

RECEIPT # AMOUNT

APPLYING

JUL - 7 2015

JUDGE

MAG. JUDGE

NIQA**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA****CASE MANAGEMENT TRACK DESIGNATION FORM**

LIVE FACE ON WEB, LLC

CIVIL ACTION

v.
EXPRESS SIGN OUTLET, INC.,
LINDA DEPAOLO**15** NO. **3765**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

<u>7/7/2015</u>	<u>JASON RABINOVICH</u>	<u>PLAINTIFF</u>
Date	Attorney-at-law	Attorney for
<u>267-423-4130</u>	<u>610-862-3764</u>	<u>JASONRABINOVICH@GMAIL.COM</u>
Telephone	FAX Number	E-Mail Address

(Civ. 660) 10/02

JUL - 7 2015

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 1300 Industrial Blvd., Suite 212, Southampton, PA 18966

Address of Defendant: 4555 Hamilton Blvd, Allentown PA 18062

Place of Accident, Incident or Transaction: Southampton, PA
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: See attached list Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☒ No ☐
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
(Please specify) Copyright infringement

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

- I, Jason Rabinovich, counsel of record do hereby certify:
- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
 - ☐ Relief other than monetary damages is sought.

DATE: 7/7/15

Jason Rabinovich, Esq.
Attorney-at-Law

308167
Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 7/7/15

Jason Rabinovich, Esq.
Attorney-at-Law

308167
Attorney I.D.#

JUL - 7 2015

NIQA

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3765

LIST OF RELATED CASES

Live Face On Web, LLC v. Dean R. Baker et al. (2:15-cv-00862-NIQA);
Live Face On Web, LLC v. Brian Drutman d/b/a Precision Spine & Wellness Center
(8:15-cv-1128-33-VAC-MAP);
Live Face On Web, LLC v. Expo Design, Inc. (6:15-cv-729-CEM-KRS);
Live Face On Web, LLC v. Expresscare Interactive, LLC (Case No. 1:14-cv-01891-
WDQ);
Live Face On Web, LLC v. Extreme Gym Inc., et al (2:15-cv-2836)
Live Face On Web, LLC v. Florida State Realty Group, Inc. (0:15-cv-60972);
Live Face On Web, LLC v. Healthbridge Management Inc. et al (2:15-cv-2835);
Live Face On Web, LLC v. iCast Interactive, LLC, et al. (Case No. 5:15-cv-00072-RH-
GRJ);
Live Face On Web, LLC v. Jackson & Joyce Family Dentistry, P.L. (5:15-cv-00232-JSM-
PRL);
Live Face On Web, LLC v. Powell Broadcasting Company, LLC (5:15-cv-00072-RS-
GRJ);
Live Face On Web, LLC v. David D. Rachimi d/b/a Pinpoint-Emarketing (9:15-cv-80601-
KAM)
Live Face On Web, LLC v. Skin Pro International, Inc. and Timothy Schmidt (15-cv-
21475-KMW);
Live Face On Web, LLC v. United California Discount Corporation (Case No. 2:14-cv-
06392-RSWL-PLA);

Respectfully submitted July 7, 2015.

By: /s/ Jason Rabinovich, Esq.
Jason Rabinovich, Esq.
Law Offices of Jason Rabinovich, PLLC.
1700 Market Street, Suite 1005
Philadelphia, PA 19103
Tel: (267) 423-4130
JasonRabinovich@jasonrabinovichlaw.com
Attorney for Plaintiff Live Face on Web LLC

§ 42 NIQA

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**LIVE FACE ON WEB, LLC,
a Pennsylvania company,**

Plaintiff,

vs.

**EXPRESS SIGN OUTLET, INC.,
a Pennsylvania corporation,**

**LINDA DEPAOLO,
an individual,**

Defendants.

15 3765

Case No.: _____

JURY TRIAL REQUESTED

Sam
7/7

COMPLAINT

Plaintiff Live Face on Web, LLC, through its undersigned counsel, for its Complaint against the Defendants listed above and alleges as follows:

I. THE PARTIES

1. Plaintiff, Live Face on Web, LLC (“LFOW”), is a Pennsylvania limited liability company with its principal place of business at 1300 Industrial Boulevard, Suite 212, Southampton, PA 18966.

2. Upon information and belief, Defendant Express Sign Outlet, Inc., is a Pennsylvania corporation with a principal place of business at 4555 Hamilton Blvd, Allentown PA 18062.

3. Upon information and belief, Defendant Linda DePaulo is a resident of the Commonwealth of Pennsylvania and the owner and/or president of Express Sign Outlet, Inc.

II. JURISDICTION AND VENUE

4. This action arising under the U.S. Copyright Act (17 U.S.C. §501 et seq.), and thus this Court has federal question jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. As fully set forth herein, Express Sign Outlet, Inc. and Linda DePaulo (collectively Defendants) have used and distributed LFOW’s software and/or infringing derivative works thereof, which are the subject of U.S. Copyright Registrations.

6. This Court has personal jurisdiction over the Defendants because the Defendants have conducted business in, and have had continuous and systematic contacts with the Commonwealth of Pennsylvania and this District.

7. This Court has personal jurisdiction over Linda DePaulo because, upon information and belief, she is a resident of the Commonwealth of Pennsylvania who is conducting business in and having continuous and systematic contacts with the Commonwealth of Pennsylvania and this District.

8. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(a) in that a substantial part of the events or omissions giving rise to the claims herein occurred in this District, and Defendants are located in this District.

III. PLAINTIFF'S BUSINESS AND COPYRIGHTED TECHNOLOGY

9. LFOW is a developer and owner of “live person” software, which is an original work of authorship independently created by LFOW (“LFOW Software”).

10. The LFOW Software allows a company to display a video of a “walking” and “talking” personal host who introduces a website to an online visitor. The personal host is, in effect, a web spokesperson for the specific company for whom the video has been created. Typically the web spokesperson explains a company’s products and/or services and directs a visitor’s attention to a particular product or aspect of the website. The LFOW Software is representative of LFOW’s advertising idea; LFOW (and its customers) advertise services and solicit business through the use of a website spokesperson, which is typically tailored to specific goods and services found on the associated website.

11. The LFOW Software enables a company to customize and dynamically modify settings and functionality of the web spokesperson. By way of example, a customer utilizing the LFOW Software can: (a) manipulate the positioning of the web spokesperson on its website and select between static, relative or dynamic positioning features; (b) adjust

the delay between the time an online visitor enters the website and the start time of the web spokesperson's presentation; (c) select the number of times a video presentation plays for each particular visitor; and (d) select "click on me" functionality that directs a user to a predetermined page or section of the website which promotes goods or services and/or reinforces the image and brand of the customer.

12. The LFOW Software seeks to enhance a web site by using a real spokesperson to capture, hold and prolong the attention of the average online visitor, enhancing the ability of the website to advertise specific goods and services. This technique has a direct positive impact on sales and/or the brand, public image and reputation of any company that has an online presence.

13. Generally speaking, the LFOW Software can be implemented by LFOW's customers by modifying the HTML code of the LFOW customer's website. An HTML script tag is embedded in the HTML code of the LFOW customer's website, which links the LFOW customer's website to a copy of the LFOW Software. An LFOW customer has the option of storing the copy of the LFOW Software on the same webserver(s) as the customer's website, or storing the copy of the LFOW Software on a different webserver(s) than the website. Many of LFOW's customers choose to have the copy of the LFOW Software stored on LFOW's web servers.

14. Regardless of the particular webserver(s) where the LFOW Software is stored, the functionality and result is the same. When a web browser is directed to a website linked to the LFOW Software, the embedded HTML script tag is read by the web browser and causes the automatic distribution of a copy of the LFOW Software. The LFOW Software is automatically saved by the web browser into cache, and/or a hard drive(s), and

loaded into computer memory and/or RAM (random access memory). As a result of the distribution of the LFOW Software, the specific web spokesperson video is automatically launched and displayed to advertise on the associated website.

15. Because the LFOW Software is written in JavaScript, it is possible to view the actual source code of the LFOW Software through a web browser. Anyone who accesses a website that has implemented the LFOW Software has access to the software. Additionally, any website visitor can download the LFOW Software and view it on virtually any text viewer or editor software (such as Word®, Notepad, etc.).

16. The LFOW Software is licensed to customers for a license fee by LFOW, which also receives fees for other services.

17. The LFOW Software is also subject to the terms and conditions of LFOW's End User License Agreement ("EULA"). Since at least October 2007, LFOW has included the web address where the EULA can be found, thus anyone who accessed any version of the LFOW Software since that time had notice of the EULA.

18. LFOW has registered the LFOW Software. Pertinent to this action, on December 20, 2007, LFOW duly registered the copyright in the LFOW Software version 7.0.0, prior to the publication of version 7.0.0, in the United States Copyright Office, as evidenced by the certificate of registration for TXu001610441, which was issued by the Register of Copyrights. A true and accurate copy of the certificate of registration is attached hereto as Exhibit A, and a true and accurate copy of the deposit work for TXu001610441 is attached hereto as Exhibit A1.

IV. DEFENDANTS' COPYRIGHT INFRINGEMENT

19. Defendants own, and/or operate and/or control the website www.express-signoutlet.com ("Defendants' website"). A copy of the HTML source code for the Defendants' website is found at Exhibit B.

20. Defendants' website advertises and promotes the products and/or services of Defendants.

21. Upon information and belief, Defendants have used a web spokesperson video to promote Defendants' products and/or services.

22. Upon information and belief, in order to display the web spokesperson video on Defendants' website, Defendants used and distributed, without permission, and therefore infringed upon, the infringing version of the LFOW Software.

23. Upon information and belief, Defendants have the right and ability to modify their own website or to have their website modified on Defendants' behalf.

24. Upon information and belief, Defendants copied and stored an infringing version of the LFOW Software on the webserver(s) for www.express-signoutlet.com.

25. Upon information and belief, to implement and distribute the infringing version of the LFOW Software, the Defendants' website was modified by or on behalf of Defendants to include the following website source code and/or text, shown in Exhibit B:
http://www.express-signoutlet.com/home.js?swf=http://www.expresssignoutlet.com/home.swf&flv=http://www.expresssignoutlet.com/home.flv&start=normal&close=close&play_when=1&align_right=false&show_loading=yes&width=480&height=360&vbm=141&x_off=115

26. This modification links the Defendants' website to the file "home.js", an infringing version of the LFOW Software, which was stored on Defendants' webserver(s). A copy of "home.js" is found at Exhibit C.

27. As a result of the modification to the Defendants' website referenced above, when a web browser retrieves a page from the Defendants' website, a copy of the infringing version of the LFOW Software is distributed by Defendants to the website visitor and stored on the visitor's computer in cache, memory and/or its hard drive. Accordingly, each visit to the Defendants' website is a new act of copyright infringement.

28. The infringing version of the LFOW Software, shown at Exhibit C is substantially similar to the LFOW Software, and includes one or more instances of "LFOW," which is a reference to LFOW. The infringing version of the LFOW Software also includes the unique prefixes "lf_" which were arbitrarily chosen by LFOW to mark its code and indicate LFOW's unique and original code. There is no functional value to the use of the letters "LFOW" or "lf_" in the LFOW Software. Instead, these were both chosen as references to LFOW and its code.

29. The web spokesperson video that launches on Defendants' website is a result of Defendants' distribution of the infringing version of the LFOW Software, which advertises and promotes the products and/or services of Defendants, encouraging the website viewer to purchase and/or use Defendants' products and/or services, thereby providing a monetary benefit to Defendants. Thus, Defendants' copyright infringement of the LFOW Software is in their advertising, and the infringement is for the purpose of advertising their products and/or services.

30. Defendants intend for a copy of the infringing version of the LFOW Software to be distributed to website visitors in their advertising, as this is necessary for the video spokesperson to appear on the screen of the website visitor. The volitional distribution of the infringing version of the LFOW Software by Defendants to their website visitors is seamless and transparent for the website visitors, who are able to view the video spokesperson advertising Defendants' products and/or services by virtue of receiving the copy of the infringing version of the LFOW Software.

31. Defendants profit directly from and have a direct financial interest in the infringement, because the use of the infringing version of the LFOW Software allows Defendants to more effectively promote and sell their products and/or services by capturing, holding and prolonging the attention of the average online visitor, providing a direct positive impact on sales and/or the brand, public image and reputation of Defendants.

32. The infringing version of the LFOW Software is a sales and advertising tool for Defendants to generate revenues and profits and, upon information and belief, the use and misuse of the infringing version of the LFOW Software by Defendants did in fact generate revenues and profits for Defendants, as more fully described below.

33. Defendants unlawfully and continuously used the infringing version of the LFOW Software on unauthorized Web Page(s), for which Defendants did not pay applicable license fees and video production fees to LFOW.

34. The unlawful use, reproduction and/or distribution of the infringing version of the LFOW Software on the Defendants' website constitutes infringement of LFOW's intellectual property rights, including, without limitation, LFOW's registered copyrighted material(s).

35. As the owner of registered copyright material in the LFOW Software, LFOW has an interest in protecting its rights against such intellectual property infringement.

36. As a result of foregoing conduct of Defendants, LFOW has suffered significant harm and loss.

37. Upon information and belief, Defendants actively induced end users to visit their website(s), and thereafter distributed the infringing version of the LFOW Software to end users (e.g. website visitors) numerous times. The actual number can only be ascertained through discovery.

38. Defendants have caused, enabled, facilitated, and/or materially contributed to the infringement by, inter alia, distributing copies of the accused software to each visitor via the Defendants' website(s) and refused to exercise their ability to stop the infringement made possible by the modification and continuous operation of their website(s).

39. As the owner of the registered copyright in the LFOW Software, LFOW has an interest in protecting its rights against such copyright infringement.

40. Under the authority of 17 U.S.C. § 504, LFOW is entitled to elect whether to recover statutory damages against Defendants for each act of copyright infringement.

41. Where Defendants initiated or continued the infringing conduct while aware of the infringement, these actions were the result of reckless disregard for, or willful blindness to LFOW's rights, and therefore constitute volitional conduct and willful infringement.

COUNT ONE
Copyright Infringement

42. LFWO incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

43. Count One is an action under 17 U.S.C. § 501 for direct, indirect and/or vicarious infringement of registered copyright(s) as against the Defendants named in this Complaint.

44. LFWO is the owner of valid copyright registration TXu001610441.

45. LFWO has complied in all respects with the provisions of the Copyright Act, 17 U.S.C. §§ 101 et seq., and all other laws governing copyright to secure the exclusive rights and privileges in and to the copyrights of the items identified herein.

46. The infringing version of the LFWO Software used and distributed by Defendants is at least substantially similar to the LFWO Software protected by TXu001610441.

47. Defendants, through their agent(s), vendor(s), officer(s), and/or employee(s), modified Defendants' website to cause the copying, use and distribution of the infringing version of the LFWO Software.

48. The past and ongoing copying, use and distribution of the infringing version of the LFWO Software by Defendants results in actual damage to LFWO, including but not limited to the loss of licensing revenue lost as a result of Defendants' infringement.

49. Defendants intentionally induced and/or encouraged direct infringement of the LFWO Software by distributing the infringing version of the LFWO Software via their website(s) and/or seeking out the LFWO Software in order to use it on their website(s).

50. Defendants profited from and have a direct financial interest in the infringement, because the use of the infringing version of the LFW Software allows Defendants to more effectively promote and sell their product(s) and/or service(s) on their own website(s) by capturing, holding, and prolonging the attention of the average online visitor, providing a direct positive impact on sales and/or brand, public image and reputation of Defendants.

51. Because Defendants own, operate and/or control their website, Defendants also have the right and ability to supervise and control the infringement and infringer by virtue of their ownership and control of their own website, but failed to do so.

52. Where Defendants initiated or continued the infringing conduct with knowledge of the infringement, these actions were the result of reckless disregard for, or willful blindness to LFW's rights, and therefore constitute willful infringement.

53. Unless Defendants are restrained and enjoined from their unauthorized use and distribution of the LFW Software, these injuries will continue to occur.

54. Irreparable harm and injury to LFW are imminent as a result of Defendants' conduct and LFW is without an adequate remedy at law.

55. Pursuant to 17 U.S.C. § 502(a), LFW is entitled to an injunction restraining Defendants, their employees and agents, and all other persons acting in concert with Defendants, from engaging in any further improper acts.

56. Pursuant to 17 U.S.C. §§ 503(a) and 503(b), LFW is entitled to an order impounding the infringing articles and the means by which such infringing articles were produced and/or reproduced.

57. Pursuant to 17 U.S.C. § 504, LFOW is also entitled to recover actual damages and any profits of Defendants, or, alternatively, to recover statutory damages of up to \$150,000 for each work infringed.

58. Pursuant to 17 U.S.C. § 505, LFOW is entitled to an award of attorneys' fees and costs.

WHEREFORE, LFOW asks this Court to enter preliminary and final orders and judgments as necessary to provide LFOW the following requested relief:

- a) Finding Defendants liable for copyright infringement by virtue of Defendants' past and ongoing unauthorized use of LFOW's Software;
- b) Finding Defendants' copyright infringement to be voluntary and an intentional violation of Defendants' known duties, and therefore willful;
- c) Finding LFOW to have suffered, and to continue suffering harm that is irreparable and otherwise without an adequate remedy at law;
- d) A permanent injunction under 17 U.S.C. §§502 and 503, enjoining Defendants from further infringement, including but not limited to the cessation of operation of Defendants' website(s);
- e) An award of damages against Defendants under §504;
- f) An award under 17 U.S.C. § 505 allowing recover of the full costs of this action, including LFOW's reasonable attorneys' fees and costs; and

g) Such and other relief as the Court deems appropriate.

JURY DEMAND

LFOW demands a jury trial on all issues so triable.

Respectfully submitted July 7, 2015.

Respectfully submitted,

Law Offices of Jason Rabinovich, PLLC.



By: /s/ Jason Rabinovich, Esq.

Jason Rabinovich, Esq.

1700 Market Street, Suite 1005

Philadelphia, PA 19103

Tel: (267) 423-4130

Fax: (610) 862-3764

JasonRabinovich@jasonrabinovichlaw.com

Attorney for Plaintiff Live Face on Web LLC

EXHIBIT A

Additional Certificate (17 U.S.C. 705)
Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number:
TXu 1-610-441

Effective date of
registration:
December 20, 2007

Title _____

Title of Work: LIVE FACE ON WEB, LLC -- Javascript Version 7.0.0

Completion/ Publication _____

Year of Completion: 2007

Author _____

Author: Live Face on Web, LLC

Author Created: New text; changes in existing text.

Work made for hire: Yes

Citizen of: United States

Anonymous: No

Pseudonymous: No

Copyright claimant _____

Copyright Claimant: Live Face on Web, LLC

1300 Industrial Blvd., Suite 202, Southamilton, PA, 18966

Limitation of copyright claim _____

Material excluded from this claim: Prior versions of this work.

Previously registered: No

New material included in claim: New text; changes to existing text.

Certification _____

Name: Tristram R. Fall, III, authorized agent of Live Face on Web, LLC

Date: December 13, 2007

Fox Rothschild LLP
Tristram Fall, III, Esquire
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

Service Request #: 1-41681852

Registration #: TXU001610441

EXHIBIT A1

TXu 1-610-441

COPY OF DEPOSIT




```
// ----- Do Not Remove -----  
// Copyright 2007 LiveFaceOnWeb, LLC  
// Version: 7.0.0  
// Date: 10/02/2007  
// End User License Agreement Location: http://www.livefaceonweb.com/eula.htm  
//  
/////////////////////////////////////  
/////////////////////////////////////  
/////////////////////////////////////  
User defined parameters and instructions  
/////////////////////////////////////  
/////////////////////////////////////  
/////////////////////////////////////  
//  
// Below enter the URL location where the files are residing  
// Example: var lf_URL = 'http://www.livefaceonweb.com/';  
// In the above example, LiveFaceOnWeb Presentation files are located at the root  
level of http://www.livefaceonweb.com  
var lf_URL = '';  
// Below select from a choice of Static, Relative, or Dynamic position for the  
LiveFaceOnWeb Presentation  
// 1 = Static Position, LiveFaceOnWeb Presentation would be in a fixed location  
// 2 = Relative Position, LiveFaceOnWeb Presentation would be located where the  
script is called from on the webpage  
// 3 = Dynamic Position, LiveFaceOnWeb Presentation would float as the page  
scrolls  
// Example: var lf_Position = 3;  
// In the above example, LiveFaceOnWeb Presentation would float as with page  
scrolls  
var lf_Position = 3  
// Below enter LiveFaceOnWeb Presentation OffSet Position  
// OffSet Position specifies the top and the left position for Static and  
Relative Positions only  
// Example: var lf_Offset_Top_Position = 50; and var lf_Offset_Left_Position =  
0;  
// In the above example, LiveFaceOnWeb Presentation would be placed 50 pixels  
from the top and 0 pixels to the left of the browser screen  
var lf_Offset_Top_Position = 0;  
var lf_Offset_Left_Position = 0;  
// Below select the preset Dynamic position for LiveFaceOnWeb Presentation  
// 1 = Top left of the browser screen  
// 2 = Top right of the browser screen  
// 3 = Bottom left of the browser screen  
// 4 = Bottom right of the browser screen  
// 5 = Middle of the browser screen  
// 6 = Top Middle of the browser screen  
// 7 = Right Middle of the browser screen  
// 8 = Bottom Middle of the browser screen  
// 9 = Left Middle of the browser screen  
// Example: var lf_Position = 4;  
// In the above example, LiveFaceOnWeb Presentation would be placed at bottom  
right of browser screen  
var lf_Position_Dynamic = 4;  
// Below enter the delay lenght in seconds before LiveFaceOnWeb Presentation  
appears  
// Example: var lf_tDLB = 5;  
// In the above example. LiveFaceOnWeb Presentation would appear after 5 seconds  
// Example: var lf tDLB = 0;
```



```

// in the above example, LiveFaceOnWeb Presentation would appear instantly
var lf_tDLB = 0;
// Below enter the amount of seconds LiveFaceOnWeb Presentation appears after it
has completed playing
// Example: var lf_TimeDelayAfter = 0;
// In the above example, this option would be disabled
// Example: var lf_tDLA = 5;
// In the above example, LiveFaceOnWeb Presentation would close 5 seconds after
it has completed playing
var lf_tDLA = 0;
// Below select how LiveFaceOnWeb Presentation should appear for the same
visitor
// 1 = Play everytime
// 2 = Play ones per visitors session
// 3 = Play in so many days
// Example: var lf_PresPlay = 1;
// In the above example LiveFaceOnWeb Presentation would play every time
// Example: var lf_PresPlay = 3; and var lf_PresPlayDays = 1;
// In the above example LiveFaceOnWeb Presentation would play ones every day
var lf_PresPlay = 1;
var lf_PresPlayDays = 0;
// Below enable the Click-On-Me Functionality for LiveFaceOnWeb Presentation
// Example: var lf_COMW = 1;
// In the above example, Click-On-Me Functionality is enabled for LiveFaceOnWeb
Presentation
// Example: var lf_COMW = 0;
// In the above example, Click-On-Me Functionality is disabled for LiveFaceOnWeb
Presentation
var lf_COMW = 0;
// Below enter the Click-On-Me Functionality URL
// Example: var lf_COMURL = 'http://www.livefaceonweb.com'
// In the above example, when a visitor would click on LiveFaceOnWeb Presentation
they would be redirected to http://www.livefaceonweb.com
var lf_COMURL = '';
// Below select Click-On-Me Functionality Window Settings
// Example: var lf_COMWP = 1;
// In the above example, the redirect window would be opened as a new browser
screen
// Example: var lf_COMWP = 0;
// In the above example, the redirect window would be opened in the same browser
screen
var lf_COMWP = 0;
// Below enable the Fade-In Effect
// Example: var lf_fIE = 1;
// In the above example, Fade-In Effect is enabled on LiveFaceOnWeb Presentation
// Example: var lf_fIE = 0;
// In the above example, this option would be disabled
var lf_fIE = 1;
// Below enter the duration of Fade-In Effect in seconds
// Example: var lf_fIET = 5;
// In the above example, LiveFaceOnWeb Presentation would Fade-In in 5 seconds
var lf_fIET = 1;
// Below select LiveFaceOnWeb Presentation play status while Fade-In Effect is
active
// Example: var lf_fIET = 1;

```

```

// In the above example, LiveFaceOnWeb Presentation would play after the Fade-In
Effect has completed
// Example: var lf_fIET = 0;
// In the above example, LiveFaceOnWeb Presentation would play while the Fade-In
Effect is occurring
var lf_fIEP = 1;
// Below enable Fade-Out Effect
// Example: var lf_fOE = 1;
// In the above example, Fade-Out Effect is enabled on LiveFaceOnWeb Presentation
// Example: var lf_fOE = 0;
// In the above example, this option would be disabled
var lf_fOE = 1;
// Below enter the duration of Fade-Out Effect in seconds
// Example: var lf_fOET = 5;
// In the above example, LiveFaceOnWeb Presentation would Fade-Out in 5 seconds
var lf_fOET = 1;
// Below enable Play-Button Functionality to appear first at the bottom left
corner
// Example: var lf_pBBE = 1;
// In the above example, Play-Button Functionality is enabled on LiveFaceOnWeb
Presentation to appear first at the bottom left corner
// Example: var lf_pBBE = 0;
// In the above example, this option would be disabled
var lf_pBBE = 0;
// Below enable Play-Button Functionality to appear first on top of the model
// Example: var lf_pBBBOF = 1;
// In the above example, Play-Button Functionality is enabled on LiveFaceOnWeb
Presentation and appear first and on top of the model
// Example: var lf_pBBBOF = 0;
// In the above example, this option would be disabled
var lf_pBBBOF = 0;
// Below enable Play-Button Functionality to appear after LiveFaceOnWeb
Presentation has completed in the bottom left corner
// Example: var lf_pBAE = 1;
// In the above example, Play-Button Functionality is enabled on LiveFaceOnWeb
Presentation after it has completed and appears on the bottom left corner
// Example: var lf_pBAE = 0; disables the Play Button Function after the
presentation ends
// In the above example, this option would be disabled
var lf_pBAE = 0;
// Below enable Play-Button Functionality to appear on top of the model after
LiveFaceOnWeb Presentation has completed
// Example: var lf_pBAOF = 1;
// In the above example, Play-Button Functionality is enabled on LiveFaceOnWeb
Presentation to appear on top of the model after LiveFaceOnWeb Presentation has
completed
// Example: var lf_pBAOF = 0;
// In the above example, this option would be disabled
var lf_pBAOF = 0;
// Below enable the Roll-Over-To-Play Effect
// Example: var lf_ROTPE = 1;
// In the above example, Roll-Over-To-Play Effect is enabled on LiveFaceOnWeb
Presentation
// Example: var lf_ROTPE = 0;
// In the above example, this option would be disabled
var lf_ROTPE = 0;

```

```
// Below enter the Complete URL for the SWF to be active within Roll-Over-To-Play Effect
// Example: var lf_rOTPURL = 'http://www.livefaceonweb.com/test.swf';
// In the above example, SWF file for Roll-Over-To-Play Effect is located at http://www.livefaceonweb.com/test.swf
var lf_rOTPURL = '';
// Below enable the Frame-Hold Effect
// Example: var lf_sFRAME = 7; shows the 7th frame while fade in/out, play button, and roll over effects
// In the above example, LiveFaceOnWeb Presentation shows 7th frame while Fade-In/Fade-Out, Play-Button, and Roll-Over-To-Play Effects occur
// Example: var lf_sFRAME = 0;
// In the above example, this option would be disabled
var lf_sFRAME = 0;
// Below enter LiveFaceOnWeb.com Affiliate ID
// Example: var affiliateID = '80961c09';
var lf_AffiliateID = '';

////////////////////////////////////
////////////////////////////////////
////////////////////////////////////
//////////////////////////////////// Do not change the parameters below ///////////////////////////////////
////////////////////////////////////
////////////////////////////////////
////////////////////////////////////

var lf_SWF_File_Width = 200;
var lf_SWF_File_Height = 220;
var lf_ID = '100000505';

var lf_divHorPos = 0;
var lf_divVerPos = 0;
var lfVersion = -1;
var arrNavInfo = [];
var lfString;
var lfParamString;
var divID = 'div' + lf_ID;

arrNavInfo.navprop = navigator.userAgent.toLowerCase();

if (navigator.vendor == 'KDE' || ( document.childNodes && ( !document.all || navigator.accentColorName ) && !navigator.taintEnabled )) {
    arrNavInfo[0] = 'kde';
    arrNavInfo[1] = 'Safari';
} else if (window.opera && document.childNodes) {
    arrNavInfo[0] = 'opr';
    arrNavInfo[1] = 'Opera';
} else if (navigator.appName.indexOf('WebTV') + 1) {
    arrNavInfo[0] = 'wtv';
    arrNavInfo[1] = 'WebTV';
} else if (navigator.product == 'Gecko') {
    arrNavInfo[0] = 'gek';
    arrNavInfo[1] = 'Gecko engine (Mozilla, Netscape 6+ etc.)';
} else if (document.getElementById) {
    arrNavInfo[0] = 'ie';
    arrNavInfo[1] = 'Internet Explorer 5+';
```

```

} else {
    arrNavInfo[0] = 'na';
    arrNavInfo[1] = 'an unknown browser';
}
if (navigator.plugins != null && navigator.plugins.length > 0)
{
    if (navigator.plugins['Shockwave Flash 2.0'] || navigator.plugins['Shockwave
Flash']) {
        var swVer2 = navigator.plugins['Shockwave Flash 2.0'] ? ' 2.0' : '';
        var lfDescription = navigator.plugins['Shockwave Flash' +
swVer2].description;
        var descArray = [];
        var tempArrayMajor = [];
        var versionMajor = [];
        var tempArrayMinor = [];
        var versionMinor;
        descArray = lfDescription.split(' ');
        tempArrayMajor = descArray[2].split('.');
        versionMajor = tempArrayMajor[0];
        if (descArray[3] != '') {
            tempArrayMinor = descArray[3].split('r');
        } else {
            tempArrayMinor = descArray[4].split('r');
        }
        versionMinor = tempArrayMinor[1] > 0 ? tempArrayMinor[1] : 0;
        lfVersion = parseFloat(versionMajor + '.' + versionMinor);
    }
} else {
    for (var i = 8; i < 20; i++)
    {
        try {
            var objFlash = new ActiveXObject('ShockwaveFlash.ShockwaveFlash.' +
i);
            if (objFlash) {
                lfVersion = i;
            }
        } catch(e) {}
    }
}
function runLFW() {
    try {
        if (lf_PresPlay == 1) {
            lf_createCookie(lf_ID, 'on', -1);
            showLFW_Video();
        } else if (lf_PresPlay == 2) {
            if (lf_readCookie(lf_ID) == 'no') {
                lf_createCookie(lf_ID, 'on');
                showLFW_Video();
            }
        } else if (lf_PresPlay == 3) {
            if (lf_readCookie(lf_ID) == 'no') {
                lf_createCookie(lf_ID, 'on', lf_PresPlayDays);
                showLFW_Video();
            }
        }
    } catch(e) {

```

```

        showLFW_Video();
    }
}
if (lfVersion >= 8) {
    if ((lf_Position !== 2) && (arrNavInfo[0] !== 'na')) {
        try {
            if (window.addEventListener) window.addEventListener('load',
runLFW, false);
            else if (window.attachEvent) window.attachEvent('onload', runLFW);
        } catch(e) {
            showLFW_Video();
        }
    } else {
        showLFW_Video();
    }
}
function showLFW_Video()
{
    if ((lf_Position !== 2) && (arrNavInfo[0] !== 'na')) {
        try {
            var lfDiv = document.createElement('div');
            if (lfDiv === undefined) {
                lf_Position = 'err';
            } else if (lfDiv == null) {
                lf_Position = 'err';
            } else {
                lfDiv.id = divID;
                lfDiv.style.position = 'absolute';
                lfDiv.style.zIndex = 9999;
                if (lf_Position == 1) {
                    lfDiv.style.left = lf_Offset_Left_Position;
                    lfDiv.style.top = lf_Offset_Top_Position;
                } else {
                    lfDiv.style.left = 0;
                    lfDiv.style.top = 0;
                }
                lfDiv.style.height = lf_SWF_File_Height;
                lfDiv.style.width = lf_SWF_File_Width;
                lfDiv.style.visibility = 'visible';
            }
        } catch(e) {
            lf_Position = 'err';
        }
    }
}
compileLFW()
if ((lf_Position !== 2) && (lf_Position !== 'err') && (arrNavInfo[0] !==
'na')) {
    lfDiv.innerHTML = lfString;
    document.body.appendChild(lfDiv);
} else if (lf_Position !== 2) {
    document.write( '<div id="' + divID +'" style="position: absolute;z-
index: 999;left: 0px;top: 0px;height: ' + lf_SWF_File_Height + 'px;width: ' +
lf_SWF_File_Width + 'px;">' + lfString + '</div>' );
} else {
    document.write( '<div id="' + divID +'" style="position: relative;z-
index: 999;left: ' + lf_Offset_Left_Position + 'px;top: ' +

```



```

lf_Offset_Top_Position + 'px;height: ' + lf_SWF_File_Height + 'px;width: ' +
lf_SWF_File_Width + 'px;">' + lfString + '</div>' );
}
if ((lf_Position !== 1) && lf_Position !== 2) {
    switch (arrNavInfo[0]) {
        case 'ie':
            window.onscroll = ScrollHnd;
            window.onresize = ScrollHnd;
            window.setInterval('ScrollHnd()', 30);
            break;
        case 'gek':
            if (window.onscroll === undefined) {
                window.setInterval('ScrollHnd()', 30);
            } else {
                window.onscroll = ScrollHnd;
                window.onresize = ScrollHnd;
            }
            break;
        case 'opr':
            window.onscroll = ScrollHnd;
            window.onresize = ScrollHnd;
            break;
        case 'kde':
            window.onscroll = ScrollHnd;
            window.onresize = ScrollHnd;
            break;
        case 'wtv':
            if (window.onscroll === undefined) {
                window.setInterval('ScrollHnd()', 30);
            } else {
                window.onscroll = ScrollHnd;
                window.onresize = ScrollHnd;
            }
            break;
    }
    ScrollHnd();
}
}
function ScrollHnd()
{
    var divScroll;
    var wnd;
    var screenWd = 0;
    var screenHt = 0;
    var screenX = 0;
    var screenY = 0;
    var objDoc;
    var divLeft = 0;
    var divTop = 0;

    objDoc = document;
    wnd = window;

    if (objDoc.getElementById) {
        divScroll = objDoc.getElementById(divID);
        if (divScroll.style) {

```



```

        divScroll = divScroll.style;
    }
}
if (window.innerHeight)
{
    screenHt = wnd.innerHeight;
    screenWd = wnd.innerWidth;
}
else if (objDoc.documentElement && ( objDoc.documentElement.clientWidth ||
objDoc.documentElement.clientHeight ))
{
    screenWd = objDoc.documentElement.clientWidth;
    screenHt = objDoc.documentElement.clientHeight;
}
else if (objDoc.body && ( objDoc.body.clientWidth ||
objDoc.body.clientHeight ))
{
    screenWd = objDoc.body.clientWidth;
    screenHt = objDoc.body.clientHeight;
}
if (window.innerHeight)
{
    screenY = wnd.pageYOffset;
    screenX = wnd.pageXOffset;
}
else if (objDoc.body && ( objDoc.body.scrollLeft || objDoc.body.scrollTop ))
{
    screenY = objDoc.body.scrollTop;
    screenX = objDoc.body.scrollLeft;
}
else if (objDoc.documentElement && ( objDoc.documentElement.scrollLeft
|| objDoc.documentElement.scrollTop ))
{
    screenY = objDoc.documentElement.scrollTop;
    screenX = objDoc.documentElement.scrollLeft;
}
divLeft = divLeft + lf_divHorPos;
divTop = divTop + lf_divVerPos;
divLeft = divLeft + screenX;
divTop = divTop + screenY;
if (lf_Position_Dynamic == 6) {
    divLeft = divLeft + ((screenWd / 2) - (lf_SWF_File_Width / 2));
} else if (lf_Position_Dynamic == 7) {
    divLeft = divLeft + (screenWd - lf_SWF_File_Width);
    divTop = divTop + ((screenHt / 2) - (lf_SWF_File_Height / 2));
} else if (lf_Position_Dynamic == 8) {
    divLeft = divLeft + ((screenWd / 2) - (lf_SWF_File_Width / 2));
    divTop = divTop + (screenHt - lf_SWF_File_Height);
} else if (lf_Position_Dynamic == 9) {
    divTop = divTop + ((screenHt / 2) - (lf_SWF_File_Height / 2));
} else {
    if (lf_Position_Dynamic == 5)
    {
        divLeft = divLeft + ((screenWd / 2) - (lf_SWF_File_Width / 2));
        divTop = divTop - ((screenHt / 2) - (lf_SWF_File_Height / 2));
    }
}

```

```

    }
    if (( lf_Position_Dynamic % 2 ) == 0)
    {
        divLeft = divLeft + (screenWd - lf_SWF_File_Width);
    }
    if (( lf_Position_Dynamic < 3 ) == false)
    {
        divTop = divTop + (screenHt - lf_SWF_File_Height);
    }
}
divScroll.left = divLeft + 'px';
divScroll.top = divTop + 'px';
}
function compileLFOW()
{
    lfParamString = '?lfID=' + lf_ID
    lfParamString += '&cOMW=' + lf_cOMW
    if (lf_cOMURL == '') {
        lfParamString += '&cOMURL=http://www.livefaceonweb.com'
    } else {
        lfParamString += '&cOMURL=' + escape(lf_cOMURL)
    }
    lfParamString += '&cOMWP=' + lf_cOMWP
    lfParamString += '&tDLB=' + lf_tDLB
    lfParamString += '&tDLA=' + lf_tDLA
    lfParamString += '&fIE=' + lf_fIE
    lfParamString += '&fIET=' + lf_fIET
    lfParamString += '&fIEP=' + lf_fIEP
    lfParamString += '&fOE=' + lf_fOE
    lfParamString += '&fOET=' + lf_fOET
    lfParamString += '&pBBE=' + lf_pBBE
    lfParamString += '&pBBBOF=' + lf_pBBBOF
    lfParamString += '&pBAE=' + lf_pBAE
    lfParamString += '&pBAOF=' + lf_pBAOF
    lfParamString += '&rOTPE=' + lf_rOTPE
    if (lf_rOTPURL == '') {
        lfParamString += '&rOTPURL=none'
    } else {
        lfParamString += '&rOTPURL=' + escape(lf_rOTPURL)
    }
    lfParamString += '&sFRAME=' + lf_sFRAME
    if (lf_AffiliateID == '') {
        lfParamString += '&lfAffiliateID=none'
    } else {
        lfParamString += '&lfAffiliateID=' + lf_AffiliateID
    }
    if (document.location.href == '') {
        lfParamString += '&sURL_Site=none'
    } else {
        lfParamString += '&sURL_Site=' + escape(document.location.href);
    }
    lfString = "<object classid='clsid:d27cdb6e-ae6d-11cf-96b8-444553540000'
width='" + lf_SWF_File_Width + "' height='" + lf_SWF_File_Height + "' id='obj" +
lf_ID + "' align='middle'
codebase='https://download.macromedia.com/pub/shockwave/cabs/flash/swflash.cab#v
ersion=8,0,24,0' >";

```

```

    lfString += "<param name='movie' value='" + lf_URL + 'lfow.swf' +
lfParamString + "' />";
    lfString += "<param name='quality' value='high' />";
    lfString += "<param name='wmode' value='transparent' />";
    lfString += "<param name='allowScriptAccess' value='always' />";
    lfString += "<param name='loop' value='false' />";
    lfString += "<embed src='" + lf_URL + 'lfow.swf' + lfParamString + "'
allowScriptAccess='always' quality='high' wmode='transparent' loop='false'
width='" + lf_SWF_File_Width + "' height='" + lf_SWF_File_Height + "' name='obj"
+ lf_ID + "' align='middle' type='application/x-shockwave-flash'
pluginspage='https://www.macromedia.com/go/getflashplayer' />";
    lfString += "</object>";
}
function lf_createCookie(strName, strValue, strDays)
{
    if (strDays) {
        var date = new Date();
        date.setTime(date.getTime() + (strDays * 24 * 60 * 60 * 1000));
        var expires = '; expires=' + date.toGMTString();
    } else var expires = '';
    document.cookie = strName + '=' + strValue + expires + '; path=/';
}
function lf_readCookie(strName) {
    var strNameplus = strName + '=';
    var arrCk = document.cookie.split(';');
    for (var i = 0; i < arrCk.length; i++) {
        var c = arrCk[i];
        while (c.charAt(0) == ' ') c = c.substring(1, c.length);
        if (c.indexOf(strNameplus) == 0) return c.substring(strNameplus.length,
c.length);
    }
    return 'no';
}

```

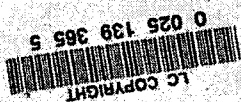


EXHIBIT B

2/2/2015

view-source:express-signoutlet.com

```

1 <!DOCTYPE HTML PUBLIC "-//W3C//DTD HTML 4.01 Transitional//EN">
2
3 <html>
4 <head>
5
6 <title>Express Sign Outlet - Lehigh Valley, PA - Interior and Exterior Signs - Vehicle
Magnets - Yard Signs - Trade Show Displays - Banners</title>
7
8 <script type="text/javascript">
9 COPYRIGHT = "Copyright &copy; Express Sign Outlet ";
10 function writeCopyright()
11 {
12 document.write(COPYRIGHT, new Date().getFullYear(), ". All rights reserved.");
13 }
14 </script>
15
16 <script type="text/JavaScript">
17 <!--
18 function MM_openBrWindow(theURL,winName,features) { //v2.0
19     window.open(theURL,winName,features);
20 }
21 //-->
22 </script>
23
24 <!-- CSS Link -->
25 <link href="main.css" rel="stylesheet" type="text/css">
26
27 <meta http-equiv="Content-Type" content="text/html; charset=iso-8859-1">
28 <META NAME="keywords" CONTENT="Express Sign Outlet, Signs Lehigh Valley, Signs Allentown
Pennsylvania, Signs Allentown PA, yard signs, A.D.A signs, interior signs, exterior signs,
site signs, monument signs, vehicle graphics, vehicle magnets, window lettering, real
estate signs, trade show displays, dimensional Lettering,neon signs, sandblasted signs,
engraved signs, light boxes">
29 <META NAME="description" CONTENT="Offering Banners, Yard signs, A. D. A & Interior
signs, Exterior/Site signs, Monument signs, Vehicle Graphics & Magnets, Window
Lettering, and more.">
30 <META NAME="robots" CONTENT="index,follow">
31 <META NAME="rating" CONTENT="General">
32 <META NAME="revisit-after" CONTENT="5 days">
33 <META HTTP-EQUIV="Content-Language" CONTENT="EN">
34 <META NAME="author" CONTENT="Lehigh Valley Website Design
admin@lehighvalleywebsitedesign.com">
35 <META NAME="distribution" CONTENT="Global">
36
37 <script language="JavaScript" type="text/javascript">
38 // *** Status line message ***
39 var appVersion=parseInt(navigator.appVersion.substring(0,1));
40 var appName=navigator.appName;
41 var newStat; var OrigStatus;
42 function setStat() {
43 if ((appName=="Netscape")&&(parseInt(appVersion)>=5)) {
44     setTimeout("statSet()",20); }
45 else { statSet(); } }
46 function statSet() {
47 if(newStat == 'Load') {
48     window.status = OrigStatus = "Express Sign Outlet"; }
49 else { window.status = newStat; } }
50 </script>
51
52 </head>
53

```


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view-source:express-signoutlet.com

```

54 <body topmargin="0" onLoad="newStat='Load';setStat();" onresize="location.reload();">
55
56 <script id='my_vsp' src='http://www.express-signoutlet.com/home.js?swf=http://www.express-
signoutlet.com/home.swf&flv=http://www.express-
signoutlet.com/home.flv&start=normal&close=close&play when=1&align right=false&show loading
=yes&width=480&height=360&vml=141&x_off=115'></script>
57
58 <div align="center">
59   <table border="0" cellpadding="0" cellspacing="0" width="948" class="main"
bgcolor="#ec2931">
60     <tr>
61       <td width="96">
62         <script language="JavaScript" type="text/javascript">
63         function Button_Source(img) {var The_Button=new Image(); The_Button.src=img; return
The_Button;}
64         </script>
65
66         <script language="JavaScript" type="text/javascript">
67         Webworks_1=Button_Source("home1.gif"); ByDi_1=Button_Source("home2.gif");</script>
68         <a href="index.html" language="JavaScript"
OnMouseOver="document['Button_1'].src=ByDi_1.src; newStat='Express Sign Outlet ~
Home';setStat();return true;" OnMouseOut="document['Button_1'].src=Webworks_1.src;
newStat=OrigStatus;setStat();return true;"></a></td>
69
70       <td width="143"><script language="JavaScript" type="text/javascript">
71       Webworks_2=Button_Source("portfolio1.gif"); ByDi_2=Button_Source("portfolio2.gif");
</script>
72       <a href="portfolio.html" language="JavaScript"
OnMouseOver="document['Button_2'].src=ByDi_2.src; newStat='Express Sign Outlet ~
Portfolio';setStat();return true;" OnMouseOut="document['Button_2'].src=Webworks_2.src;
newStat=OrigStatus;setStat();return true;"></a></td>
73
74       <td width="178"><script language="JavaScript" type="text/javascript">
75       Webworks_3=Button_Source("testimonials1.gif"); ByDi_3=Button_Source("testimonials2.gif");
</script>
76       <a href="testimonials.html" language="JavaScript"
OnMouseOver="document['Button_3'].src=ByDi_3.src; newStat='Express Sign Outlet ~
Testimonials';setStat();return true;" OnMouseOut="document['Button_3'].src=Webworks_3.src;
newStat=OrigStatus;setStat();return true;"></a></td>
77
78       <td width="126"><script language="JavaScript" type="text/javascript">
79       Webworks_4=Button_Source("contact1.gif"); ByDi_4=Button_Source("contact2.gif");</script>
80       <a href="contact.html" language="JavaScript"
OnMouseOver="document['Button_4'].src=ByDi_4.src; newStat='Express Sign Outlet ~
Contact';setStat();return true;" OnMouseOut="document['Button_4'].src=Webworks_4.src;
newStat=OrigStatus;setStat();return true;"></a></td>
81
82       <td width="165"><script language="JavaScript" type="text/javascript">
83       Webworks_5=Button_Source("directions1.gif"); ByDi_5=Button_Source("directions2.gif");
</script>
84       <a href="directions.html" language="JavaScript"
OnMouseOver="document['Button_5'].src=ByDi_5.src; newStat='Express Sign Outlet ~
Contact';setStat();return true;" OnMouseOut="document['Button_5'].src=Webworks_5.src;
newStat=OrigStatus;setStat();return true;"></a></td>
85
86

```

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```

      <td align="center"></td>
87   </tr>
88   </table>
89 </div>
90
91 <div align="center">
92   <table border="0" cellpadding="0" cellspacing="0" width="948" bgcolor="#ffffff">
93     <tr>
94       <td align="center">
95         
96       </td>
97       <td align="center"><a href="index.html"></a></td>
98
99       <td align="center"></td>
100    </tr>
101  </table>
102 </div>
103
104 <map name="Map">
105 <area shape="rect" coords="1,5,155,106" href="signs.html" target="_self" alt="SIGNS">
106 <area shape="rect" coords="169,10,341,109" href="promo.html" target="_self" alt="PROMO
ITEMS">
107 </map>
108
109 <map name="Map2">
110 <area shape="rect" coords="38,11,207,91" href="vehicles.html" target="_self"
alt="VEHICLES">
111 <area shape="rect" coords="212,9,377,87" href="banners.html" target="_self" alt="BANNERS">
112 </map>
113
114 <div align="center">
115   <table border="0" cellpadding="0" cellspacing="0" width="948" bgcolor="#ffffff">
116     <tr>
117       <td width="175" valign="top"></td>
118
119       <td width="570" align="center" valign="top" class="headline">
120         <br>
121
122         Free On-Site Consultations<br></td>
123
124       <td width="203" valign="top"></td>
125     </tr>
126   </table>
127 </div>
128
129 <div align="center">
130   <table border="0" cellpadding="0" cellspacing="0" width="948" height="273"
bgcolor="#ffffff" class="main">
131     <tr>
132       <td width="25"></td>
133
134       <td align="left">
135         <br>
136
137         <font color="#d5151d"><b>Why Express Sign Outlet?</b></font>
138         What are you looking for when you need a sign? Quality and presence right? Help enhance
your company's
139

```

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image with eye-catching signs that make you stand out from your competition.

Whether it is a large or small sign in front of your building, vehicle lettering on your company vehicles
to business cards and promotional products - all of these items help to brand your company's name.

At Express Sign Outlet, we help our customers increase visibility and profitability with high-quality signs, promotional items, vehicle wraps, printing and graphic design services.

We have been exceeding customer expectations since opening our family-owned store in 2006 and our goal has always been your success.

Call today for your free estimate or visit us at our retail shop in Allentown, PA . . . serving the Lehigh Valley and beyond.

</td>

<td width="20"></td>

<td width="304">

<div align="center">

<table border="0" cellpadding="0" cellspacing="0" width="303" height="223" background="home_bk.jpg">

<tr>

<td width="291" height="218" valign="top">

<!--

<script type="text/javascript">

Image1 = new Image; Image1.src = "home1.jpg";

Image2 = new Image; Image2.src = "home2.jpg";

Image3 = new Image; Image3.src = "home3.jpg";

Image4 = new Image; Image4.src = "home4.jpg";

whichPic = new Array(Image1.src, Image2.src, Image3.src, Image4.src);

showpic = 1;

numpics = 4;

delay = 2.00;

setTimeout("slideshow()",(delay * 1500));

function slideshow() {

document.changepic.src = whichPic[showpic];

showpic += 1;

if(showpic == numpics) { showpic = 0; }

setTimeout("slideshow()",(delay * 1500));

}

</script>

-->

</td>

</tr>

</table>

</div></td>

<td width="24"></td>

</tr>

</table>

</div>

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```

192 <div align="center">
193   <table border="0" cellpadding="0" cellspacing="0" width="948" height="22"
bgcolor="#e84933">
194     <tr>
195       <td width="571"></td>
196
197       <td width="377"><a href="portfolio.html">
198         </a></td>
199     </tr>
200   </table>
201 </div>
202
203 <div align="center">
204   <table border="0" cellpadding="0" cellspacing="0" width="948" height="76"
bgcolor="#ffffff">
205     <tr>
206       <td width="10"></td>
207
208       <td width="200"><br>
209 <div align="center">
210   <table border="0" cellpadding="0" cellspacing="0" width="100%" class="main">
211     <tr>
212       <td valign="top"></td>
213       <td>&nbsp;<a href="http://express-signoutlet.com/promo-portfolio.html"><font
color="#424d96"><b>Printing</b></font></a><br>
214       <br>
215       <span class="footer">Business Cards<br> Letterhead<br> Brochures</span></td>
216     <td><a href="http://express-signoutlet.com/promo-portfolio.html">
217       </a></td>
218     </tr>
219   </table>
220 </div></td>
221
222   <td width="30"></td>
223
224   <td width="171"><br>
225 <div align="center">
226   <table border="0" cellpadding="0" cellspacing="0" width="100%" class="main">
227     <tr>
228       <td valign="top"></td>
229       <td>&nbsp;<a href="http://express-signoutlet.com/vehicle-portfolio.html"><font
color="#424d96"><b>Vehicles</b></font></a><br>
230       <br>
231       <span class="footer">Wraps<br> Lettering<br> Magnetics</span></td>
232     <td><a href="http://express-signoutlet.com/vehicle-portfolio.html">
233       </a></td>
234     </tr>
235   </table>
236 </div></td>
237
238   <td width="30"></td>
239
240   <td width="175"><br>
241 <div align="center">
242   <table border="0" cellpadding="0" cellspacing="0" width="100%" class="main">
243     <tr>
244       <td valign="top"></td>
245       <td>&nbsp;<a href="http://express-signoutlet.com/promo-portfolio.html"><font
color="#424d96"><b>Apparel</b></font></a><br>
246       <br>

```

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view-source:express-signoutlet.com

```

247     <span class="footer">Tee Shirts<br> Hats<br> Polos</span></td>
248     <td><a href="http://express-signoutlet.com/promo-portfolio.html"></a></td>
249   </tr>
250 </table>
251 </div></td>
252
253     <td width="15"></td>
254
255     <td width="231"><br>
256     <br>
257     </td>
258
259     <td width="30"></td>
260
261     <td width="36"><br>
262     <a href="javascript:;" onClick="MM_openBrWindow('http://www.facebook.com/pages/EXPRESS-
SIGN-
OUTLET/141576755853489','top=108,left=115,width=767,height=450,menubar=yes,location=yes,
scrollbars=yes,resizable=yes')">
263     <a><br>
264     </td>
265
266     <td width="20"></td>
267   </tr>
268 </table>
269 </div>
270
271 <div align="center">
272   <table border="0" cellpadding="0" cellspacing="0" width="948" height="30"
bgcolor="#ffffff">
273     <tr>
274       <td align="center"></td>
275     </tr>
276   </table>
277 </div>
278
279     <br>
280
281 <div align="center">
282   <table align="center" border="0" cellpadding="0" cellspacing="0" width="100%"
class="small">
283     <tr>
284       <td align="center"><script type="text/javascript">writeCopyright();</script><br>
285       <br>
286
287     <a href="javascript:;"
onClick="MM_openBrWindow('http://www.lehighvalleywebsitedesign.com','top=108,left=115,wi
dth=767,height=450,menubar=yes,location=yes,scrollbars=yes,resizable=yes')"><font
color="#ffffff">Originally Designed by Lehigh Valley Website Design</a><br>
288     <font color="#ffffff">Maintained & Hosted by <a href="http://www.vanderson.net"
target="_blank">Vanderson</a></font></td>
289   </tr>
290 </table>
291 </div><br>
292
293 </body>
294 </html>
295

```

EXHIBIT C


```

function parseGetVars(url) {
    var map = {};
    var parts = url.replace(/[?&]+(?:^=&+)=([^&]*)/gi, function(m,key,value) {
        map[key] = value;
    });
    return map;
}
var getVars = parseGetVars(document.getElementById('my_vsp').src);

var my_swf = getVars['swf'];
var vsp_flv = getVars['flv'];
var vsp_flv2 = getVars['flv2'];

var x_off = getVars['x_off'];

    var ma_a = getVars['width'] / 480;
    var ma_b = 200 * ma_a;
    var w = Math.round(ma_b);

    var ma_c = w / 200;
    var ma_d = 150 * ma_c;
    var h = Math.round(ma_d);
//var w = 200;
//var h = 150;

/* Playback Parameters */
if(getVars['start'] == 'mini')
{
    var shrink_on_start = 'yes';
}
else
{
    var shrink_on_start = 'no';
}

if(getVars['close'] == 'shrink')
{
    var shrink_on_end = 'yes';
    var shrink_on_stop = 'yes';
    var close_on_end = 'no';
    var close_on_stop = 'no';
}
else
{
    var shrink_on_end = 'no';
    var shrink_on_stop = 'no';
    var close_on_end = 'yes';
    var close_on_stop = 'yes';
}

if(getVars['show_loading'] == '')
{
    var show_loading = 'yes';
}
else
{
    var show_loading = getVars['show_loading'];
}

```

2/2/2015 www.express-signoutlet.com/home.js?swf=http://www.express-signoutlet.com/home.swf&flv=http://www.express-signoutlet.com/home.flv&start=normal...

```

if(getVars['vlm'] == '')
{
    var vlm = 80;
}
else
{
    var vlm = getVars['vlm'];
}

var vlm = getVars['vlm'];

/*
    Switch Mode:
    1: Sequential
    2: Random
*/
var switchMode = 2;

/* Date Range:
    If set to false, the optional date range parameter is ignored
    If set to true .. the swf is only displayed if it falls on that reange.
*/
var useDateRange = false;

/*
    Properties are specified as follows:
    'url,width,height,lf_Position, lf_Position_Dynamic, lf_OffSet_Top_Position,
    lf_OffSet_Left_Position,right_align,play_when,start_date,end_date,small_width, small_height'
    play_when: 1=any, 2=first visit only, 3=subsequent visits
    date format: {m/d/y H:M} e.g. {9/1/09 13:15} or just the time {9:30}. if blank, just
use {}
*/
var arr_GLOBAL_SOURCE = new Array
(
    my_swf+', '+getVars['width']+', '+getVars['height']+',3,3,0,0,'+getVars['align_right']+'
, '+getVars['play_when']+', {}, {}, '+w+', '+h

);
/* End Properties */

```

```

/*
YHeads-Player playerbase .JS file.
Version 1.5.0.0
Last Modified: 11/29/2009
*/

```

```
/* BEGIN --- cookie functions */
```

```
var firstVisit = true;
```

```

function getCookie(c_name) {
    if (document.cookie.length>0) {
        c_start=document.cookie.indexOf(c_name + "=");
        if (c_start!=-1) {
            firstVisit = false;
            c_start=c_start + c_name.length+1;

```

2/2/2015 www.express-signoutlet.com/home.js?swf=http://www.express-signoutlet.com/home.swf&flv=http://www.express-signoutlet.com/home.flv&start=normal...

```

        c_end=document.cookie.indexOf(";",c_start);
        if (c_end== -1)
            c_end=document.cookie.length;
        return unescape(document.cookie.substring(c_start,c_end));
    }
}
return "";
}

function setCookie(c_name,value,expiredays) {
    var exdate=new Date();
    exdate.setDate(exdate.getDate()+expiredays);
    document.cookie=c_name+ "=" +escape(value)+((expiredays==null) ? "" :
";expires="+exdate.toGMTString());
}

var cookieName = "swfID";
var cookieVal = getCookie(cookieName);
var swfIndex = 0;

/* END --- cookie functions */

/* START --- Date Check functions */
function validRange(s, e) {
    if ( !s && !e ) {
        return false;
    }
    var v = false;
    if ( s ) {
        v = validDate(s,true)
    }
    if ( e ) {
        var v_e = validDate(e,false)
        if ( v ) {
            v = v_e;
        }
    }
    return v;
}

function validDate(dt,s) { //yy,mm,dd,hh,mm,ss

    if (!dt)
        return false;

    var today = new Date();

    dt = dt.replace('{', '');
    dt = dt.replace('}', '');
    var y = 0;
    var m = 0;
    var d = 0;
    var hh = 0;
    var mm = 0;

    var arr_dt = dt.split(' ');
    if ( arr_dt[0].split('/')[2]) {
        y = arr_dt[0].split('/')[2];
        m = arr_dt[0].split('/')[0] - 1;
        d = arr_dt[0].split('/')[1];
    }
}

```

2/2/2015 www.express-signoutlet.com/home.js?swf=http://www.express-signoutlet.com/home.swf&flv=http://www.express-signoutlet.com/home.flv&start=normal...

```

        if (arr_dt[1]) {
            hh = arr_dt[1].split(':')[0];
            mm = arr_dt[1].split(':')[1];
        }
        var v_dt = new Date(y, m, d, hh, mm ,0);
    }
    else if (arr_dt[0].split(':')[1]) { // only time is specified
        y = today.getFullYear();
        m = today.getMonth();
        d = today.getDate();
        hh = arr_dt[0].split(':')[0];
        mm = arr_dt[0].split(':')[1];
        var v_dt = new Date(y, m, d, hh, mm ,0);
    }

    var days = 0;
    var difference = 0;

    var v_dt = new Date(y, m, d, hh, mm ,0);
    //alert(v_dt.toString());
    difference = v_dt - today;

    days = Math.round(difference/(1000*60*60*24));

    //alert(dt + ' - ' + difference);
    //y + ', ' + m + ', ' + d + ', ' + hh + ', ' + mm + ', 0');
    //alert(v_dt + ' - ' + today + ' - ' + dt + ' - ' + days);

    if (difference < 0 && s) {
        return true;
    }
    else if(difference > 0 && !s) {
        return true;
    }

    return false;
}

/* END ----- Date Check functions */

var arr_GLOBAL = new Array();

if (useDateRange) {
    for ( var i=0; i<arr_GLOBAL_SOURCE.length; i++ ) {
        var arr_prop = arr_GLOBAL_SOURCE[i].split(',');
        if ( validRange(arr_prop[9], arr_prop[10]) ) {
            arr_GLOBAL.push(arr_GLOBAL_SOURCE[i]);
        }
    }

    // if no dates are valid... just pick up the swfs with no date
    if (arr_GLOBAL.length == 0) {
        for ( var i=0; i<arr_GLOBAL_SOURCE.length; i++ ) {
            var arr_prop = arr_GLOBAL_SOURCE[i].split(',');
            if ( !arr_prop[9] && !arr_prop[10] ) {
                arr_GLOBAL.push(arr_GLOBAL_SOURCE[i]);
            }
        }
    }
}
}

```

2/2/2015 www.express-signoutlet.com/home.js?swf=http://www.express-signoutlet.com/home.swf&flv=http://www.express-signoutlet.com/home.flv&start=normal...

```
// at this point, arr_GLOBAL should have valid swfs by date
// narrow down the source to just the filtered videos
if (arr_GLOBAL.length > 0) {
    arr_GLOBAL_SOURCE = arr_GLOBAL;
    arr_GLOBAL = new Array();
}

// now filter by visit
for ( var i=0; i<arr_GLOBAL_SOURCE.length; i++ ) {
    var arr_prop = arr_GLOBAL_SOURCE[i].split(',');
    if ( firstVisit && (arr_prop[8] == 1 || arr_prop[8] == 2) ) {
        arr_GLOBAL.push(arr_GLOBAL_SOURCE[i]);
    }
    else if ( firstVisit == false && (arr_prop[8] == 1 || arr_prop[8] == 3) ) {
        arr_GLOBAL.push(arr_GLOBAL_SOURCE[i]);
    }
}

// if no movies quality, then ignore previous filter
/*
if (arr_GLOBAL.length > 0) {
    arr_GLOBAL = arr_GLOBAL_SOURCE;
}
*/

if ( cookieVal.length > 0 ) {
    if (switchMode == 1) {
        swfIndex = Math.round(cookieVal) + 1;
        if (swfIndex >= arr_GLOBAL.length) {
            swfIndex = 0;
        }
    }
    else {
        swfIndex = Math.floor(Math.random()*(arr_GLOBAL.length))
    }
}

//alert('cookieVal: ' + cookieVal + '\nswitchMode: ' + switchMode + '\narr_GLOBAL: ' +
arr_GLOBAL + '\nswfIndex: ' + swfIndex);

setCookie(cookieName, swfIndex, 7);

if(cookieVal.length > 0 && getVars['play_when'] == 2) { }
else {
    var arr_SwfInfo = arr_GLOBAL[swfIndex].split(',');

    var lf_URL = arr_SwfInfo[0];
    var GLOBAL_WIDTH = arr_SwfInfo[1];
    var GLOBAL_HEIGHT = arr_SwfInfo[2];
    var lf_Position = arr_SwfInfo[3];
    var lf_Position_Dynamic = arr_SwfInfo[4];
    var lf_Offset_Top_Position = arr_SwfInfo[5];
    var lf_Offset_Left_Position = arr_SwfInfo[6];
    var rt_Align = arr_SwfInfo[7];
    var sm_GLOBAL_WIDTH = arr_SwfInfo[11];
    var sm_GLOBAL_HEIGHT = arr_SwfInfo[12];
    var lf_ID = '01010';
    var lfVersion = -1;
    var arrNavInfo = [];
```

2/2/2015 www.express-signoutlet.com/home.js?swf=http://www.express-signoutlet.com/home.swf&flv=http://www.express-signoutlet.com/home.flv&start=normal...

```

var lfString;
var viewState = 1;

if ( shrink_on_start == undefined ) {
    shrink_on_start = "yes";
}
if ( shrink_on_stop == undefined ) {
    shrink_on_stop = "yes";
}
if ( close_on_stop == undefined ) {
    close_on_stop = "no";
}
if ( shrink_on_end == undefined ) {
    shrink_on_end = "yes";
}
if ( close_on_end == undefined ) {
    close_on_end = "no";
}
if ( show_loading == undefined ) {
    show_loading = "yes";
}

var divID = 'div' + lf_ID;

arrNavInfo.navprop = navigator.userAgent.toLowerCase();

if (navigator.vendor == 'KDE' || ( document.childNodes && ( !document.all ||
navigator.accentColorName ) && !navigator.taintEnabled )) {
    arrNavInfo[0] = 'kde';
    arrNavInfo[1] = 'Safari';
} else if (window.opera && document.childNodes) {
    arrNavInfo[0] = 'opr';
    arrNavInfo[1] = 'Opera';
} else if (navigator.appName.indexOf('WebTV') + 1) {
    arrNavInfo[0] = 'wtv';
    arrNavInfo[1] = 'WebTV';
} else if (navigator.product == 'Gecko') {
    arrNavInfo[0] = 'gek';
    arrNavInfo[1] = 'Gecko engine (Mozilla, Netscape 6+ etc.)';
} else if (document.getElementById) {
    arrNavInfo[0] = 'ie';
    arrNavInfo[1] = 'Internet Explorer 5+';
} else {
    arrNavInfo[0] = 'na';
    arrNavInfo[1] = 'an unknown browser';
}

if (navigator.plugins != null && navigator.plugins.length > 0)
{
    if (navigator.plugins['Shockwave Flash 2.0'] || navigator.plugins['Shockwave Flash']) {
        var swVer2 = navigator.plugins['Shockwave Flash 2.0'] ? ' 2.0' : '';
        var lfDescription = navigator.plugins['Shockwave Flash' + swVer2].description;
        var descArray = [];
        var tempArrayMajor = [];
        var versionMajor = [];
        var tempArrayMinor = [];
        var versionMinor;
        descArray = lfDescription.split(' ');
        tempArrayMajor = descArray[2].split('.');
        versionMajor = tempArrayMajor[0];
    }
}

```


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```

    if (descArray[3] != '') {
        tempArrayMinor = descArray[3].split('r');
    } else {
        tempArrayMinor = descArray[4].split('r');
    }
    versionMinor = tempArrayMinor[1] > 0 ? tempArrayMinor[1] : 0;
    lfVersion = parseFloat(versionMajor + '.' + versionMinor);
}
} else {
    for (var i = 8; i < 20; i++)
    {
        try {
            var objFlash = new ActiveXObject('ShockwaveFlash.ShockwaveFlash.' + i);
            if (objFlash) {
                lfVersion = i;
            }
        } catch(e) {}
    }
}

function initVideo() {
    showLFW_Video();
}

if ((lf_Position !== 2) && (arrNavInfo[0] !== 'na')) {
    try {
        if (window.addEventListener) window.addEventListener('load', initVideo, false);
        else if (window.attachEvent) window.attachEvent('onload', initVideo);
    } catch(e) {
        showLFW_Video();
    }
} else {
    showLFW_Video();
}

function showLFW_Video()
{
    if ((lf_Position !== 2) && (arrNavInfo[0] !== 'na')) {
        try {
            var lfDiv = document.createElement('div');
            if (lfDiv === undefined) {
                lf_Position = 'err';
            } else if (lfDiv == null) {
                lf_Position = 'err';
            } else {
                if(navigator.appName == "Microsoft Internet Explorer" && document.compatMode
== "BackCompat") { //this line added by corey 02/23/2010
                    lfDiv.id = divID;
                    lfDiv.style.position = 'absolute';
                    lfDiv.style.zIndex = 9999;
                    lfDiv.style.left = 0;
                    lfDiv.style.top = 0;
                    lfDiv.style.height = GLOBAL_HEIGHT;
                    lfDiv.style.width = GLOBAL_WIDTH;
                    lfDiv.style.visibility = 'visible';
                    //lfDiv.style.overflow = 'hidden';
                    //lfDiv.style.overflow = 'hidden';
                    }//////////This area added by corey 02/23/2010
                else { ////////////
                    lfDiv.id = divID;
                    lfDiv.style.position = 'fixed';
                }
            }
        }
    }
}

```

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```

        lfDiv.style.zIndex = 9999; ////////////
        lfDiv.style.left = 0; ////////////
        lfDiv.style.bottom = 0; ////////////
        lfDiv.style.height = GLOBAL_HEIGHT; //
        lfDiv.style.width = GLOBAL_WIDTH; ////
        lfDiv.style.visibility = 'visible'; //
        //lfDiv.style.overflow = 'hidden';
        //lfDiv.style.overflow = 'hidden'; ////
        }//////////
    }
    } catch(e) {
        lf_Position = 'err';
    }
}
makeScript()
if ((lf_Position !== 2) && (lf_Position !== 'err') && (arrNavInfo[0] !== 'na')) {
    lfDiv.innerHTML = lfString;
    document.body.appendChild(lfDiv);
} else if (lf_Position !== 2) {
    if(navigator.appName == "Microsoft Internet Explorer" && document.compatMode ==
"BackCompat")
    {
        document.write( '<div id="' + divID +'" style="overflow:hidden;
position: absolute;z-index: 999;left: 0px;top: 0px;height: ' + GLOBAL_HEIGHT + 'px;width: ' +
GLOBAL_WIDTH + 'px;">' + lfString + '</div>' );
    }
    else
    {
        document.write( '<div id="' + divID +'" style="overflow:hidden;
bottom:0px left:0px; z-index: 999; top:0px; height: ' + GLOBAL_HEIGHT + 'px;width: ' +
GLOBAL_WIDTH + 'px;">' + lfString + '</div>' );
    }
}
else {
    if(navigator.appName == "Microsoft Internet Explorer" && document.compatMode
== "BackCompat")
    {
        document.write( '<div id="' + divID +'" style="overflow:hidden;
position: relative;z-index: 999;left: ' + lf_Offset_Left_Position + 'px;top: ' +
lf_Offset_Top_Position + 'px;height: ' + GLOBAL_HEIGHT + 'px;width: ' + GLOBAL_WIDTH + 'px;">' +
lfString + '</div>' );
    }
    else
    {
        document.write( '<div id="' + divID +'" style="overflow:hidden;
bottom:0px z-index: 999;left: ' + lf_Offset_Left_Position + 'px;top: ' +
lf_Offset_Top_Position + 'px; height: ' + GLOBAL_HEIGHT + 'px;width: ' + GLOBAL_WIDTH + 'px;">' +
lfString + '</div>' );
    }
}

switch (arrNavInfo[0]) {
    case 'ie':
        if (window.onscroll === undefined) {
            window.setInterval('ScrollHnd()', 30);
        } else {
            window.onscroll = ScrollHnd;
        }

        window.onresize = moveVid;

```

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```

        //window.onscroll = ScrollHnd;
        //window.onresize = ScrollHnd;
        //window.setInterval('ScrollHnd()', 30);
    break;
    case 'gek':
        if (window.onscroll === undefined) {
            window.setInterval('ScrollHnd()', 30);
        } else {
            window.onscroll = ScrollHnd;
        }
        window.onresize = moveVid;
    break;
    case 'opr':
        window.onscroll = ScrollHnd;
        window.onresize = ScrollHnd;
    break;
    case 'kde':
        window.onscroll = ScrollHnd;
        window.onresize = ScrollHnd;
    break;
    case 'wtv':
        if (window.onscroll === undefined) {
            window.setInterval('ScrollHnd()', 30);
        } else {
            window.onscroll = ScrollHnd;
            window.onresize = ScrollHnd;
        }
    break;
}
ScrollHnd();
}
function ScrollHnd()
{
    var divScroll;
    var wnd;
    var screenWd = 0;
    var screenHt = 0;
    var screenX = 0;
    var screenY = 0;
    var objDoc;
    var divLeft = 0;
    var divTop = 0;

    objDoc = document;
    wnd = window;

    if (objDoc.getElementById) {
        divScroll = objDoc.getElementById(divID);
        if (divScroll.style) {
            divScroll = divScroll.style;
        }
    }
    if (window.innerHeight)
    {
        screenHt = wnd.innerHeight;
        screenWd = wnd.innerWidth;
    }
    else if (objDoc.documentElement && ( objDoc.documentElement.clientWidth ||
objDoc.documentElement.clientHeight ))
    {

```

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```

        screenWd = objDoc.documentElement.clientWidth;
        screenHt = objDoc.documentElement.clientHeight;

    }
    else if (objDoc.body && ( objDoc.body.clientWidth || objDoc.body.clientHeight ))
    {
        screenWd = objDoc.body.clientWidth;
        screenHt = objDoc.body.clientHeight;
    }
    if (window.innerHeight)
    {
        screenY = wnd.pageYOffset;
        screenX = wnd.pageXOffset;
    }
    else if (objDoc.body && ( objDoc.body.scrollLeft || objDoc.body.scrollTop ))
    {
        screenY = objDoc.body.scrollTop;
        screenX = objDoc.body.scrollLeft;
    }
    else if (objDoc.documentElement && ( objDoc.documentElement.scrollLeft ||
objDoc.documentElement.scrollTop ))
    {
        screenY = objDoc.documentElement.scrollTop;
        screenX = objDoc.documentElement.scrollLeft;
    }
    divLeft = divLeft;
        if (rt_Align == 'true') /** added 9/22/09 ***/
            divLeft += screenX;
    divTop = divTop + screenY;
    divLeft = divLeft;
        if (rt_Align == 'true'){ /** added 9/22/09 : Modified 11/30/09 ***/
            if (viewState == 1) {
                divLeft += (screenWd - GLOBAL_WIDTH);
            }
            else {
                divLeft += (screenWd - sm_GLOBAL_WIDTH - 30);
            }
        }
        if (viewState == 1) {
            divTop = divTop + (screenHt - GLOBAL_HEIGHT);
        }
        else {
            divTop = divTop + (screenHt - GLOBAL_HEIGHT) + (GLOBAL_HEIGHT - sm_GLOBAL_HEIGHT);
        }
    divScroll.left = divLeft + 'px';
        if(navigator.appName == "Microsoft Internet Explorer" && document.compatMode ==
"BackCompat")
        {
            divScroll.top = divTop + 'px';
        }
    }
    function makeScript()
    {
        lfString = "<object classid='clsid:d27cdb6e-ae6d-11cf-96b8-444553540000' width='" +
GLOBAL_WIDTH + "' height='" + GLOBAL_HEIGHT + "' id='obj' + lf_ID + "' align='middle'
codebase='https://download.macromedia.com/pub/shockwave/cabs/flash/swflash.cab#version=8,0,24,
0' >";
        lfString += "<param name='movie' value='" + lf_URL + "' />";
        lfString += "<param name='quality' value='high' />";
        lfString += "<param name='wmode' value='transparent' />";
        lfString += "<param name='flashvars'

```

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```

value='cc='+getVars['cc']+"&x_off="+x_off+"&vlm="+vlm+"&flv_loc="+vsp_flv+"&shrink_on_start="
+ shrink_on_start + "&shrink_on_stop=" + shrink_on_stop + "&close_on_stop=" + close_on_stop +
"&shrink_on_end=" + shrink_on_end + "&close_on_end=" + close_on_end + "&show_loading=" +
show_loading + "' />";
  lfString += "<param name='allowScriptAccess' value='always' />";
  lfString += "<param name='loop' value='false' />";
  lfString += "<embed src='" + lf_URL + "' allowScriptAccess='always' quality='high'
wmode='transparent'
flashvars='cc='+getVars['cc']+"&x_off="+x_off+"&vlm="+vlm+"&flv_loc="+vsp_flv+"&w=" +
sm_GLOBAL_WIDTH + "&h=" + sm_GLOBAL_HEIGHT + "&shrink_on_start=" + shrink_on_start +
"&shrink_on_stop=" + shrink_on_stop + "&close_on_stop=" + close_on_stop + "&shrink_on_end=" +
shrink_on_end + "&close_on_end=" + close_on_end + "&show_loading=" + show_loading +
"&awidth='" + GLOBAL_WIDTH + "&aheight='" + GLOBAL_HEIGHT + "' loop='false' width='" +
GLOBAL_WIDTH + "' height='" + GLOBAL_HEIGHT + "' name='obj' + lf_ID + "' align='middle'
type='application/x-shockwave-flash'
pluginspage='https://www.macromedia.com/go/getflashplayer' />";
  lfString += "</object>";
}

function yh_hide() {
  ScrollHnd();
  if (document.getElementById) { // DOM3 = IE5, NS6
    document.getElementById(divID).style.display = 'none';
  }
  else {
    if (document.layers) { // Netscape 4
      document.divID.display = 'none';
    }
    else { // IE 4
      document.all.divID.style.display = 'none';
    }
  }
  ScrollHnd();
}

function yh_grow() {
  ScrollHnd();
  viewState = 1;
  if (document.getElementById) { // DOM3 = IE5, NS6
    document.getElementById(divID).style.width = GLOBAL_WIDTH + 'px';
    document.getElementById(divID).style.height = GLOBAL_HEIGHT + 'px';
  }
  else {
    if (document.layers) { // Netscape 4
      document.divID.width = GLOBAL_WIDTH + 'px';
      document.divID.height = GLOBAL_HEIGHT + 'px';
    }
    else { // IE 4
      document.all.divID.style.width = GLOBAL_WIDTH + 'px';
      document.all.divID.style.height = GLOBAL_HEIGHT + 'px';
    }
  }
  ScrollHnd();
}

function yh_shrink() {
  ScrollHnd();
  viewState = 2;
  if (document.getElementById) { // DOM3 = IE5, NS6
    document.getElementById(divID).style.width = sm_GLOBAL_WIDTH + 'px';
    document.getElementById(divID).style.height = sm_GLOBAL_HEIGHT + 'px';

```

```
        //document.getElementById(divID).style.overflow = 'hidden';
    }
    else {
        if (document.layers) { // Netscape 4
            document.divID.width = sm_GLOBAL_WIDTH + 'px';
            document.divID.height = sm_GLOBAL_HEIGHT + 'px';
        }
        else { // IE 4
            document.all.divID.style.width = sm_GLOBAL_WIDTH + 'px';
            document.all.divID.style.height = sm_GLOBAL_HEIGHT + 'px';
        }
    }
    ScrollHnd();
}

function moveVid() {
    document.getElementById(divID).offsetLeft = lf_Offset_Left_Position - GLOBAL_WIDTH;
    document.getElementById(divID).offsetTop = lf_Offset_Top_Position - GLOBAL_HEIGHT;
}

}
```